



**U.S. Department of Justice**  
*United States Attorney*  
*Eastern District of Wisconsin*

517 East Wisconsin Avenue

414 / 297-1700

Milwaukee, WI 53202

July 24, 2013

Honorable Rudolph T. Randa  
United States District Court Judge  
Federal Courthouse 310  
517 East Wisconsin Avenue  
Milwaukee, WI 53122

Re: *United States v. Nicole Talsky*  
Case No. 12-Cr-189

Dear Judge Randa,

On July 23, 2013, defendant Nicole Talsky filed a Motion to Reopen the Detention Hearing. Prior to filing this motion, defense counsel for Ms. Talsky contacted undersigned government counsel regarding the defendant's desire to be released. The government objects to Ms. Talsky's release because the circumstances have not changed since March 7, 2013, when this Court ordered Ms. Talsky's detention pending trial, which is currently set for November 18, 2013.

Government counsel sent a plea offer to defense counsel on May 15, 2013. Since that date, government counsel has been in contact with defense counsel regarding possible resolution in this case. The government's plea offer contemplates a period of imprisonment for Ms. Talsky.

As of the date of this letter, government counsel is waiting for a response from the U.S. Marshals Service as to whether Ms. Talsky has received visits from any medical or dental provider while in custody at the Dodge County Detention Facility. The government will notify the Court upon receiving a response from the U.S. Marshals Service.

Respectfully submitted at Milwaukee, Wisconsin, this 24<sup>th</sup> day of July, 2013.

JAMES L. SANTELLE  
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